

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK
ALBANY DIVISION

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In re:	Chapter 11
HIGHGATE LTC MANAGEMENT, LLC, d/b/a Northwoods Rehabilitation & Extended Care Facilities,	Case Nos. 07-11068
Debtor.	Jointly Administered

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ADMINISTRATIVE EXPENSE CLAIM

The Long Hill Alliance Company ("Long Hill") hereby files this administrative expense claim in accordance with the order of the Court. Long Hill served as the Receiver for the Highgate Facilities in accordance with an order of the Supreme Court of the State of New York dated November 29, 2006 and an order of this Court dated May 18, 2007. By the order of the Supreme Court in November, Long Hill was discharged as Receiver and a substitute receiver was appointed. Each of these orders indicated that Long Hill was not liable for any expenses or claims against the Facilities. Out of an abundance of caution, Long Hill files this claim in an unknown amount to protect its rights under those orders and common law to contribution and indemnity, including any unreimbursed legal fees and expenses incurred in defending itself with respect to any claims arising from these bankruptcy cases and filed in accordance with the orders of the Courts. At this point, Long Hill is not aware of any such claims. The Trustee has copies of the relevant orders.

CLERK OF THE
BANKRUPTCY COURT
N.D. OF NY
ALBANY

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August 19, 2009
Hartford, Connecticut

THE LONG HILL ALLIANCE COMPANY

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